

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

MARRIOTT INTERNATIONAL, INC.,

Plaintiff

v.

Case No: 1:21-cv-00610-AJT/JFA

DYNASTY MARKETING GROUP LLC et al.

Co- Defendant

ANSWER TO FIRST AMENDED COMPLAINT

COMES NOW the Defendant, Dynasty Marketing Group, LLC, by counsel, Phillip S. Griffin, II, Esquire, who states the following by and as his Answer to Plaintiff's May, 2022

Complaint:

1. The Defendant, Dynasty Marketing Group, LLC (DVC) by Bruno Borra, admits to the allegations and averments in paragraph 111,
2. The Defendant Dynasty Marketing Group, LLC (DVC) by Bruno Borra denies and demands strict proof of all the allegations and averments in paragraphs 9 re: residency, 109, 110-112, 114, 132-148 counts 1 & 2, 156-171 counts 4 & 5, 172-179 count 6, 181-186, 188-190, 192, 194, 195, 197-201, 217-223, 225-229, 231-238 and 246-250.
3. The Defendant Dynasty Marketing Group, LLC (DVC) by Bruno Borra denies and demands strict proof of all the allegations and averments in paragraphs as they are not mentioned in this amended complaint (or original complaint) for violating Plaintiff in paragraphs 2-6 and 115-119. The Defendant Dynasty

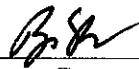
Marketing Group, LLC (DVC) is not specifically mentioned for any action in most of this complaint.

4. The Defendant Dynasty Marketing Group, LLC (DVC) by Bruno Borra, can neither admit or deny the allegations and averments in paragraphs 7, 8, 10-19, 23, 27-45, 47-58, 120-130, 149-154, 181 and 187 and specifically denies trademark counterfeiting, infringement, false designation of origin, trademark dilution, unfair competition, false advertising, violating federal statutes or Virginia statutes.
5. The Defendant, Dynasty Marketing Group, LLC (DVC) by Bruno Borra, is unaware of the original complaint.
6. No answer is required in paragraphs 1, 20, 21, 22, 25, 26, 46, 131, 155, 180, 191, 193, 196, 202-215, 216, 224, 230 and 245. The Defendant is not making robocalls or unauthorized calls in violation of any statute, state or federal.
7. No answer is requested from this defendant in counts 3, 10 and 14 as this defendant is not in "Group 1".

WHEREAS defendant denies any judgment should be entered against this defendant and the case dismissed.

Respectfully submitted,

DYNASTY MARKETING GROUP, LLC


By: 
Counsel

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Certificate

I hereby certify that on the 2 day of August, 2022 the foregoing Answer to First Amended Complaint was emailed and mailed via postage prepaid First Class USPS to:

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